



# **Risk Management Program Seminar**

Nampa, ID

May 18, 2004

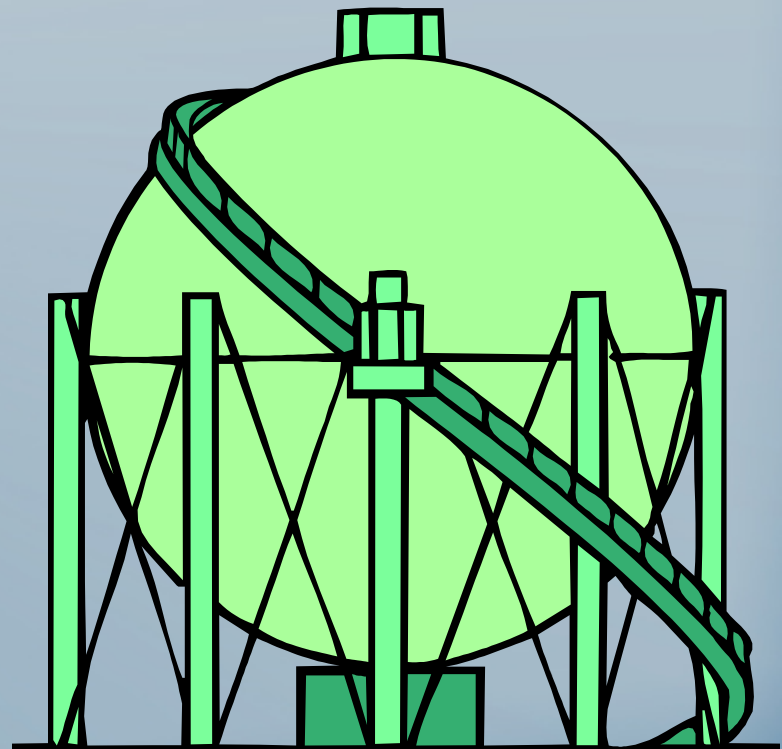
Sponsored by: RETA and US EPA

Kelly Huynh, RMP Coordinator

# **Revised RMP Rule**

# Revised RMP Rule

- Final - April 9, 2004  
(69 FR 18819)
- Admin corrections  
do not effect 5-yr  
anniversary date



# Revised RMP Rule Outline



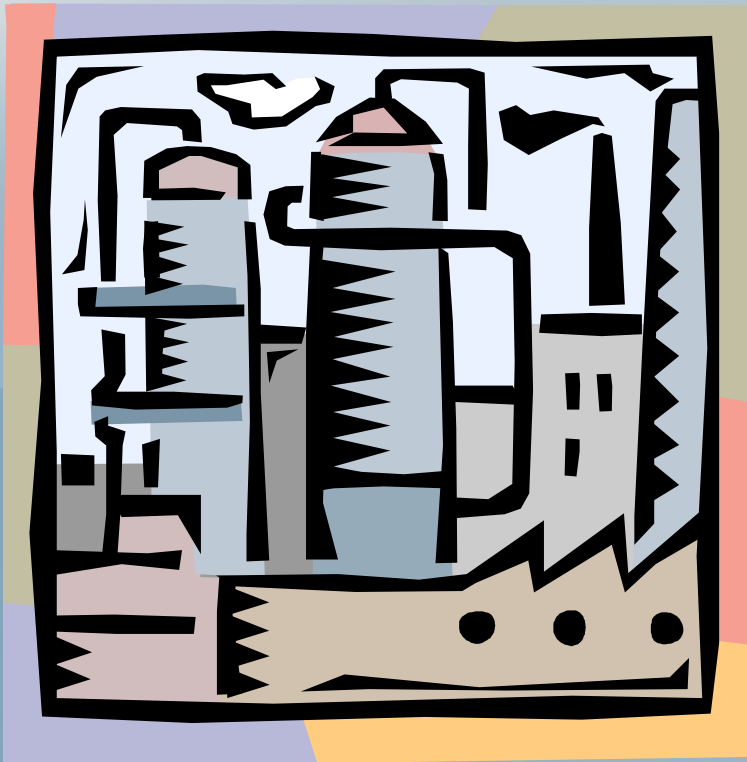
- Changes to RMP Submission Requirements
- Changes to Executive Summary
- New Data Elements
- Revisions to RMP Submit Format
- Clarifications
- Resources

# Changes to RMP Submission Requirements

- Five-Year Accident History
  - After 4/9/04, accidents that meet the criteria for the 5-year accident history are required to revise elements of RMP within 6-months of the date of the accident



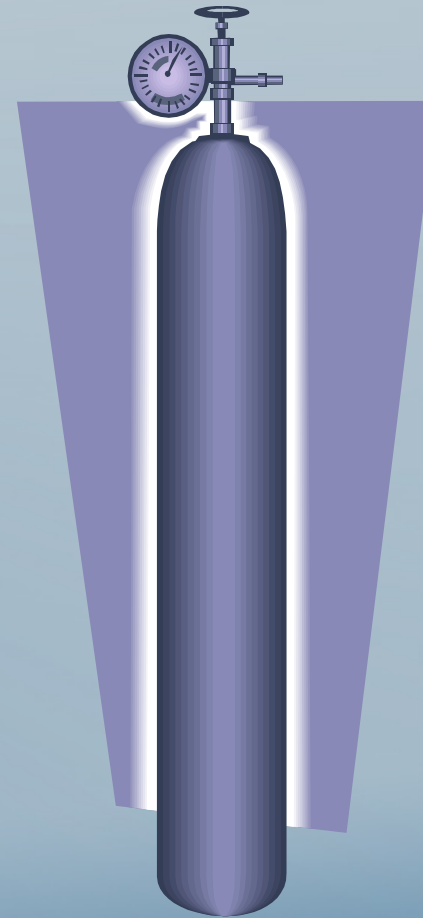
# Changes to RMP Submission Requirements



- Emergency Contact Information
  - After 6/21/04, facilities must correct their emergency contact information within 1-month of a change

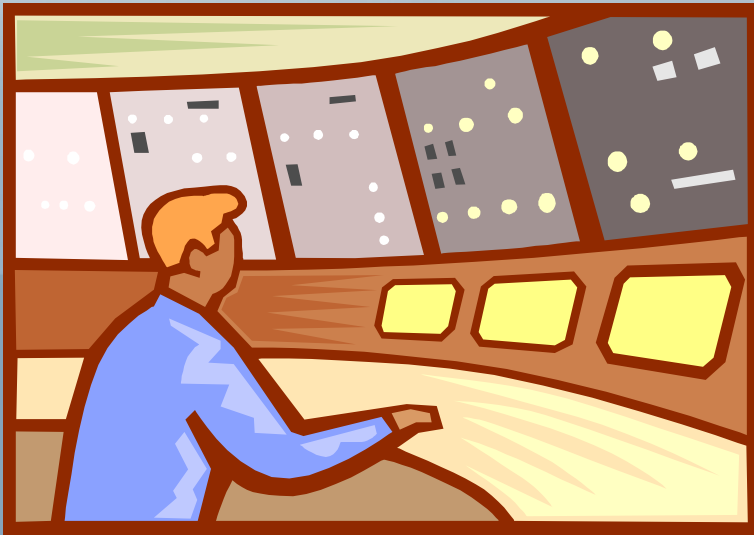
# Changes to Executive Summary

- OCA Description
  - No longer required to briefly describe your off-site consequence analysis (i.e., worse-case accidental release scenario(s) and the alternative release scenario(s) with the executive summary of the RMP.



# New Data Elements

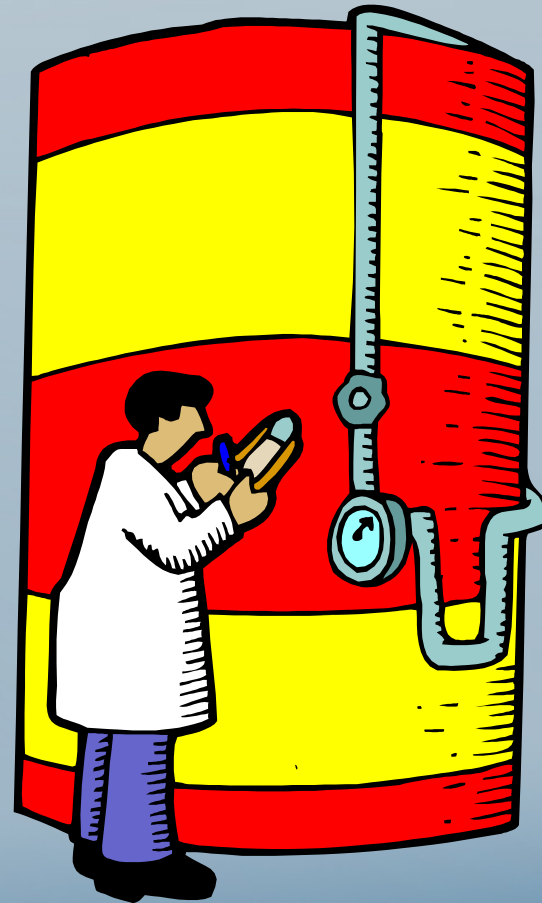
- Facility Emergency  
Contacts E-mail  
Address required (if  
any) by 6/21/04





# New Data Elements

- Reason for Subsequent RMP Submissions
  - Beginning 6/21/04, must identify the purpose of any submissions that change or otherwise effect an earlier RMP submission



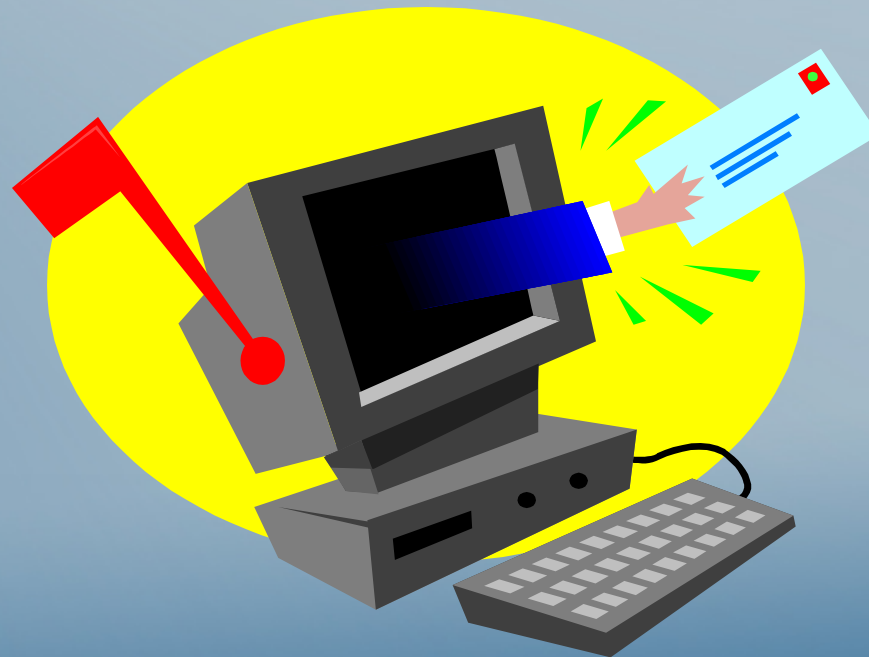
# New Data Elements



- Contractor Information (if any)
  - By 6/21/04, must provide the name, address and telephone number of the contractor that helped prepare the RMPs

# New Optional Data Element

- EPA is allowing inclusion of an e-mail address of the facility person responsible for the RMP.



# Revisions to RMP Submit Format

- Uncontrolled/Runaway Reactions
  - The list of possible causes of accidental releases to the reporting of sources' 5-year accident history now includes whether the accident involved an uncontrolled/runaway reaction.



# Clarification

- If you submitted an RMP before 6/21/99, your resubmittal deadline is 6/21/04
  - IF no changes to facility that require an update sooner

# References

<http://www.epa.gov/ceppo>

<b>Fact Sheet - on RMP Rule</b>	<b>Overview of the amendments contained in the final rule and instructions on how to obtain more information.</b>	<b>March 2004</b>
<b>Final RMP Rule</b>	<b>Makes changes to the reporting requirements of the RMP. 69 FR 18819-18832</b>	<b>April 9, 2004</b>
<b>Updated FAQ</b>	<b>RMP Amendments Rule FAQ</b>	<b>April 2004</b>
<b>RMP Web Registration Correction</b>	<b>Web-based tool to update admin portions of RMP to comply w/ revised rule. Can't remove OCA data from Executive Summary in here though. If anniversary after 6/21/04, ltr from HQ late May w/ password.</b>	<b>Expected May 2004</b>

The background features a large, light blue circle on the left side, partially overlapping a white rectangular area in the top-left corner. The rest of the background is a solid light blue color.

# **Resubmission**



# Resubmission

- If you are the owner or operator of an RMP-covered facility you're req'd to fully update and resubmit your RMP every 5 years
- Most submitted initial RMP's by original June 21, 1999 deadline



# Resubmission Outline



- RMP Content
- Common Mistakes
- Previous RMP Plan is Missing
- How do I Resubmit?
- Deregistration
- References

# RMP Content



- Registration Info (Section 1)
- Off-site consequences analysis (sections 2-5)
- 5 –yr accident history (section 6)
- Prevention program (sections 7-8)
- Emergency response program (section 9)

# **Common Mistakes**

## **Registration Info**

- Facility and Parent Co. Name
- Mailing address
- Lat/Longs
  - GPS, USGS topo maps, Web-based siting tools (TRI program), LandView 6 (has 2000 census data)
- NAIC codes
  - changed for construction and wholesale
- Executive Summary not in ASCII DOS Text format and/or is not submitted on the diskette

# **Common Mistakes**

## **OCA**

- Current population/environmental receptors
  - 2000 Census data
- Unidentified graphics

# **Common Mistakes**

## **General**

- Missing certification letter
- Damaged diskettes
- Paper submissions not on the official form

# Previous RMP Plan is Missing

- Letter to EPA
  - Letterhead
  - From original facility official (not contractor)
  - Include 12 digit number
- EPA will mail (never email) double wrapped CD after
  - Verifying requester
  - Receiving original letter



# How Do I Resubmit?

- RMP \*Submit 2004 reflects revised rule
- RMP\*Comp is a free program you can use to prepare the information for the offsite consequence analyses sections (both worst case scenarios and alternative scenarios; both toxics and flammables) required for the RMP



# Deregistration

- Submit Itr or RMP\*Submit generated Itr w/in 6 months including:
  - Effective date (not longer covered by part 68)
  - 12 digit id number
  - Signed by owner/operator
  - On letterhead
- RMP retained in RMP\*Info database for 15 yrs



# References

<http://www.epa.gov/ceppo>

RMP*Comp	free computer program you can use to complete the offsite consequence analyses.	
Fact Sheet - RMP Checklist	Checklist of key RMP elements such as Process Hazard Analysis revalidation; use of the latest census data; and tools for determining latitude and longitude.	February 2004
RMP*Submit 2004	Updated, free, personal computer software EPA developed for facilities to use in submitting RMPs required under the Risk Management Program. software found at <a href="http://yosemite.epa.gov/oswer/ceppoweb.nsf/content/ap-rmsb.htm">http://yosemite.epa.gov/oswer/ceppoweb.nsf/content/ap-rmsb.htm</a>	April 2004
RMP*Submit 2004 Users Manual	Provides comprehensive instructions on the use of RMP*Submit 2004, including instructions on new features.	April 2004
General RMP Guidance	General industry guidance for Risk Management Programs	April 2004
Updated PHA Guidance	Updated guidance to review Process Hazard Analysis	Expected June 2004

# Electronic Updates

- OEPPR listserv
  - [Lyris@lists.epa.gov](mailto:Lyris@lists.epa.gov)  
Subscribe EPA-CEP firstname lastname

# For Further Information



## Regional Contacts:

- **Kelly Huynh**  
[huynh.kelly@epa.gov](mailto:huynh.kelly@epa.gov),  
(206) 553-1679
- **Calvin Terada**  
[terada.calvin@epa.gov](mailto:terada.calvin@epa.gov),  
(206) 553-4141
- **Harry Bell**  
[bell.harry@epa.gov](mailto:bell.harry@epa.gov),  
(206) 553-8183

# Confidential Business Information

- Confidential business information (CBI)
  - regulatory provisions (40 CFR §2.208) governing CBI claims and decide if the information you consider confidential meets the applicable criteria for CBI.
  - At the same time you submit your RMP, you must submit ON SEPARATE PAPER FORMS the information that you are claiming CBI and your substantiation that the information meets the criteria for CBI.